

contributes to the image display overlaps with a time period in which the voltage is applied that does not contribute to the image display, as recited in independent claim 1, and similarly recited in independent claims 7, 13 and 17.

The Office Action admits at page 3 that Gates does not disclose or suggest the above noted-features of the claimed invention. However, the Office Action makes the following assertions. The Office Action asserts that Gates discloses at col. 19, lines 20-25 that a "delay between the positive pulse and the negative pulse can be non-existent." See page 4 of the Office Action. Applicants respectfully submit that this is not exactly what is disclosed in Gates. Specifically, at col. 19, lines 20-25, Gates discloses that "[t]he positive signal 4 can be applied immediately after the negative pulse 2, or it can be applied after a delay." In other words, it is clear in Gates that a time period in which the voltage is applied that contributes to the image display **does not** overlap with a time period in which the voltage is applied that does not contribute to the image display, contrary to that recited in the claims.

The Office Action further asserts that due to the "switching of Evans, which can be simultaneous...it would be obvious to the skilled artisan at the time of the invention to have time period of contribution and non contribution voltage application overlap because Evans suggests such a drive feature...." See page 4 of the Office Action. The Office Action contends that Evans at col. 6, lines 25-35 supports the above-mentioned assertion. See Page 3 of the Office Action. Applicants respectfully disagree.

Evans at col. 6, lines 25-35 merely discloses how to address a color pigment at a cross point  $X_2$ ,  $Y_3$ . See Fig. 4 and col. 6, lines 25-35. Specifically, Evans presumes at col. 6, lines 21-24 that yellow pigments have positive charge and blue pigments have negative charge. Then, at col. 6, lines 25-35, Evans discloses that to bring a yellow color at the cross point  $X_2$ ,  $Y_3$ ,  $S_1$  is brought into contact with terminal  $Y_3$ . Note that  $S_1$  connects terminal  $Y_3$  to a negative terminal. See Fig. 4. Simultaneously or subsequently,  $S_4$  is switched to a positive

terminal of a power supply and  $S_3$  is switched to the terminal  $X_2$ . According to Evans, then an electric field is established. The consequence of the electric field caused by switches  $S_1$  and  $S_3$  is that the yellow pigments having positive charge are attracted to a transparent conductor which has negative polarity impressed upon it and blue pigments having negative charges are attracted to a conductive line having positive polarity impressed upon it.

Clearly, this disclosure of Evans has nothing to do with the voltage which is applied that contributes to the image display overlaps with a time period in the voltage which is applied that does not contribute to the image display, as recited in the claims. That is, the claims recite two different voltages overlapping within a time period. However, Evans' Fig. 4 shows that only a single voltage is applied between the transparent conductor and the conductor line when  $S_1$  connects terminal  $Y_3$  to a negative terminal and, simultaneously or subsequently,  $S_4$  is switched to a positive terminal of a power supply and  $S_3$  is connected to the terminal  $X_2$ . Thus, Evans does not disclose or suggest the voltage which is applied that contributes to the image display overlaps with a time period in the voltage which is applied that does not contribute to the image display, which requires at least two voltages to be applied.

Specifically, Claim 1 further recites "a voltage applying component by which a voltage is applied to the display side electrodes and the rear side electrodes both contributing to image display to generate therebetween a potential difference which triggers particle movement, and a voltage is applied to the display side electrodes and the rear side electrodes, in which at least one of the display side electrodes and the rear side electrodes do not contribute to image display, to generate therebetween a potential difference which is smaller than the potential difference which triggers particle movement...."

Claims 7, 13 and 17 similarly recite this feature.

Clearly, Evans does not disclose or suggest this feature. Therefore, it is respectfully submitted that Gates and Evans, individually or in combination, does not disclose or suggest a time period in which the voltage is applied that contributes to the image display overlaps with a time period in which the voltage is applied that does not contribute to the image display, as claimed in claims 1, 7, 13 and 17.

Inoue does not make up for the above-noted deficiencies of Gates. Inoue discloses in Fig. 1 that the elements 1 are glass sheets of an electrophoretic display device. Nowhere does Inoue disclose or suggest the features of claims 1, 7, 13 and 17.

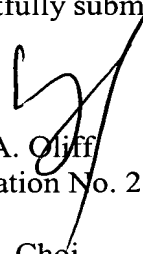
Thus, independent claims 1, 7, 13 and 17 define patentable subject matter. Claims 2-6, 8-12, 14-16 and 18-20 depend from the respective independent claims, and therefore also define patentable subject matter. Accordingly, withdrawal of the rejection under 35 U.S.C. §103(a) is respectfully requested.

## **II. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-20 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Yong S. Choi  
Registration No. 43,324

JAO:YSC/scg

Date: May 9, 2005

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

**DEPOSIT ACCOUNT USE  
AUTHORIZATION**

Please grant any extension  
necessary for entry;  
Charge any fee due to our  
Deposit Account No. 15-0461